

PLAINTIFF

KENNETH HICKS JR
LATESHIA HICKS

DEFENDANT

THE TAVERNA COLLECTION

On or around AUGUST 24 2024...I KENNETH HICKS contacted THE TAVERNA COLLECTION, located in WEST PARK, FL, in regards to a CADILLAC ESCALADE ESV PLATINUM thru CARGURUS. I was soon contacted by BLAKE CAMPBELL. The truck was discussed and in a few days a contract was signed to trade my 2015 CHEVROLET SUBURBAN LTZ for the CADILLAC ESCALADE ESV PLATINUM. The contract was signed online through email by me and my wife LATESHIA HICKS, on AUGUST 28 2024 .The lien holder on the contract was SANTANDER.On SEPTEMBER 10 2024 I contacted THE TAVERNA COLLECTION and informed them I couldn't make the trade happen due to shipping logistics. Later that morning I was contacted by a person by the name of Eddie who was informing me thru text that THE TAVERNA COLLECTION had been reworking my deal and could save me money over the term of the loan and to contact him ASAP. I DECLINED. Later on or around SEPTEMBER 21 2024 I contacted THE TAVERNA COLLECTION to see if the truck was still available. MR.BLAKE CAMPBELL informed me it was. I then suggested I drive to FLORIDA from VIRGINIA to make the trade happen if the same deal of a lower interest rate was still available. I was advised it was by BLAKE CAMPBELL. A new contract was sent to me via email and a new lender, which was listed as CAPITAL ONE AUTO FINANCE. My wife and I signed the contract on SEPTEMBER 22 2024. I then left VIRGINIA headed to FLORIDA with my teenage son on SEPTEMBER 27 2024. I arrived at THE TAVERNA COLLECTION on SEPTEMBER 28 2024 and took possession of the vehicle being told to add the truck to my insurance with CAPITAL ONE AUTO FINANCE as the lien holder. I returned to VIRGINIA. On or around OCTOBER 7 2024 I noticed on THE TAVERNA COLLECTION website my trade in truck as well as the vehicle I purchased from them was for sale. I then reached out to NICK BOUSTEAD the general manager of THE TAVERNA COLLECTION. MR. NICK BOUSTEAD then informed me that they had to scrap the previous contract due to CAPITAL ONE AUTO FINANCE withdrawing

the loan and they were creating a new one. On OCTOBER 9 2024 I received a new contract with a higher interest rate and a higher monthly payment. I signed the contract in good faith thinking things had fallen through. On or around OCTOBER 14 2024 I began to receive letters from CAPITAL ONE AUTO FINANCE and SANTANDER informing me that my loan applications were denied back on AUGUST 26 2024 two days before I signed any contract with THE TAVERNA COLLECTION. WITH the EVIDENCE I have collected and attached to this complaint I will prove that THE TAVERNA COLLECTION KNOWINGLY AND WILLINGLY VIOLATED 18 u.s.c 1343 AND 18 u.s.c 1341. In order to get me to come from VIRGINIA to FLORIDA and purchase a vehicle under false pretenses. THE TAVERNA COLLECTION and everyone named in this complaint ran a bait and switch scam. I ask that this HONORABLE COURT hold THE TAVERNA COLLECTION accountable to the amount of \$300,000 in damages and punitive damages.

RESPECTFULLY

KENNETH HICKS JR



LaTeshia Hicks

48 Sycamore Avenue
Newport News Va 23607

01khicks@gmail.com
(434)264-2256

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
DIVISION**

KENNETH SLAESTHIA HICKS
Plaintiff(s),

v.

Civil Action Number: _____

THE TAVERNA COLLECTION
Defendant(s),

LOCAL RULE 83.1 (N) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared or assisted in the preparation of Complaint.
(Title of Document)

KENNETH HICKS Lateshia Hicks

Name of *Pro Se* Party (Print or Type)



~~Signature of Pro Se Party~~

Executed on: 1/22/24 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____.
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document.

(Name of *Pro Se* Party (Print or Type))

Signature of Pro Se Party

Executed on: _____ (Date)